

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et
al.,

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

**Declaration of Terrence M.
Connors, Esq.**

Case No. 24-CV-40-EAW-MJR

MOTION ON BEHALF OF:

Intervenors Clear Creek Legal, LLC;
Credit Advocates Law Firm, LLC;
Greenstone Legal Group; Bradon Ellis
Law Firm LLC; Hailstone Legal
Group; Hallock and Associates; Harbor
Legal Group; Anchor Law Firm,
PLLC; Bedrock Legal Group; Boulder
Legal Group; Canyon Legal Group,
LLC; Great Lakes Law Firm;
Heartland Legal Group; Level One
Law; Meadowbrook Legal Group;
Monarch Legal Group; Newport Legal
Group, LLC; Northstar Legal Group;
Option 1 Legal; Pioneer Law Firm
P.C.; Rockwell Legal Group; Spring
Legal Group; Royal Legal Group; Slate
Legal Group; Stonepoint Legal Group;
The Law Firm of Derek Williams,
LLC; Whitstone Legal Group; Wyolaw,
LLC; Chinn Legal Group, LLC; Leigh
Legal Group, PLLC; Hallock &
Associates LLC; Gustafson Consumer
Law Group, LLC; Michel Law, LLC;

The Law Office of Melissa Michel LLC;
and Moore Legal Group, LLC
(collectively, “Law Firms”), by and
through their attorneys Connors LLP

DATE, TIME, AND PLACE
OF MOTION:

To be determined by this Court before
the Hon. Michael J. Roemer, United
States Magistrate Judge, Robert H.
Jackson United States Courthouse, 2
Niagara Square, Buffalo, New York
14202.

Oral argument is requested.

RELIEF REQUESTED:

An Order of this Court (1) directing
the Receiver to instruct Global Client
Solutions to resume fee payments to
Hailstone and Royal; and (2) directing
the Receiver to increase staffing levels
and provide the Law Firms with
access to certain services, personnel,
systems, and information as described
in the accompanying memorandum of
law.

GROUND FOR
RELIEF REQUESTED:

This Court’s March 4, 2024
Preliminary Injunction Order (Dkt.
184).

SUPPORTING PAPERS:

Declaration of Terrence M. Connors,
Esq., dated March 20, 2024, with
exhibits and the accompanying
Memorandum of Law.

The Law Firms intend to submit reply
papers.

DATED: Buffalo, New York
March 20, 2024

/s/ Terrence M. Connors
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